

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 461 & 2412**

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER  
(I) AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES  
EFFECTIVE AS OF MARCH 31, 2025 AND (B) ABANDON CERTAIN PERSONAL  
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on March 29, 2025, the Debtors filed the *Thirty-Ninth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 2412) (the “**Thirty-Ninth Rejection Notice**”). Attached to the Thirty-Ninth Rejection Notice was a proposed form of order (the

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

“**Proposed Order**”) approving the Thirty-Ninth Rejection Notice and authorizing the Debtors to reject the unexpired leases of distribution centers located at (a) 2855 Selma Hwy, Montgomery, AL 36108 (the “**Montgomery Lease**”) and (b) 50 Rausch Creek Rd, Tremont, PA 17981 (the “**Tremont Lease**” and, together with the Montgomery Lease, the “**Distribution Center Leases**”), each effective as of March 31, 2025 or such later date as provided in the Revised Proposed Order (as defined below).

3. The deadline to object to the Thirty-Ninth Rejection Notice was April 14, 2025, at 4:00 p.m. (ET).

4. Prior to the objection deadline, the Debtors received informal comments from the applicable landlord for the Distribution Center Leases (collectively, the “**Landlord**”), but have otherwise received no objections to the Thirty-Ninth Rejection Notice.

5. The Debtors have revised the Proposed Order (the “**Revised Proposed Order**”) to incorporate comments received from the Landlord. The changes requested by the Landlord, including the changes and additions in paragraphs 2, 4, 5, 9, 10, 11 and 12, are similar to those made to the *Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Leases Effective as of January 31, 2025 and (B) Abandon Certain Personal Property and (II) Granting Related Relief* (D.I. 1932), entered on February 5, 2025, which approved the rejection of the Debtors’ lease of the Durant, OK distribution center.

6. The Revised Proposed Order is attached as **Exhibit A** hereto. For the convenience of the Court and all parties in interest, a redline comparing the Revised Proposed Order to the Proposed Order is attached as **Exhibit B** hereto.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the order attached hereto as **Exhibit A** at its earliest convenience.

Dated: April 15, 2025  
Wilmington, Delaware

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